

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JACKSON HEWITT INC.,

Plaintiff/Counterdefendant,

v.

THE TAX MASTER, INC. and ELIZABETH
BUZALSKI,

Defendants/Counterclaimants.

Case No. 2:13-cv-00389-SRC-CLW

**STIPULATION OF VOLUNTARY
WITHDRAWAL OF ANSWER AND
COUNTERCLAIMS AND TO ENTRY OF
DEFAULT**

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff Jackson Hewitt Inc. ("Jackson Hewitt") and Defendants Elizabeth Buzalski and The Tax Master, Inc. (together, "Defendants"), that Defendants' Answer to the Complaint With Counterclaims and Demand For Trial By Jury filed on May 29, 2013 (Docket No. 9), including all Affirmative Defenses and Counterclaims asserted therein, is hereby withdrawn with prejudice.

IT IS HEREBY FURTHER STIPULATED AND AGREED, by and between Jackson Hewitt and Defendants, that Defendants agree to the entry of default against Defendants. In support of this Stipulation, the parties state as follows:

1. Elizabeth Buzalski is a Defendant in the above-captioned case. Elizabeth Buzalski is the President and sole owner of Defendant, The Tax Master, Inc. Elizabeth Buzalski is authorized to make this Stipulation on her own behalf and on the behalf of The Tax Master, Inc.

2. On January 18, 2013, Plaintiff Jackson Hewitt Inc. ("Jackson Hewitt") filed a Complaint against Defendants in this Court.

3. On May 29, 2013, Defendants filed their Answer to the Complaint With Counterclaims and Demand For Trial By Jury. Docket No. 9 (the "Answer and Counterclaims").

4. On July 1, 2014, former counsel for Defendants, Jardim, Meisner & Susser, P.C., withdrew its representation of Defendants. *See* Docket Nos. 27 and 30. As part of former counsel's application to withdraw as counsel, counsel stated that "[w]ith respect to [The Tax Master, Inc.], it will withdraw its answer and counterclaim without prejudice and will submit to entry of a default." Docket No. 27.

5. On September 24, 2014, the Court held a telephonic status conference. During the September 24, 2014 status conference, Elizabeth Buzalski stated that Defendants each would withdraw their Answer and Counterclaims with prejudice and submit to entry of default.

6. Based on the foregoing, Defendants hereby stipulate and agree to the withdrawal of Defendants' Answer and Counterclaims with prejudice and to entry of default judgment against Defendants.

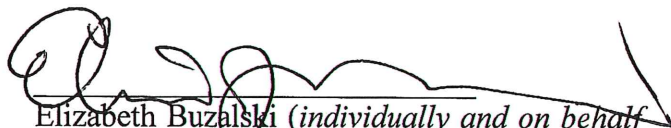
7. Defendants represent that they understand the content of this Stipulation and enter it voluntarily, freely, and without coercion, having not been influenced by any other person.

SO STIPULATED

Dated: ~~September~~ ^{October} 3rd, 2014

/s/ James S. Coons
James S. Coons, Esq.
ANSA ASSUNCAO, LLP
Two Tower Center Boulevard, Suite 1600
East Brunswick, New Jersey 08816
Telephone: 732-993-9850
Facsimile: 732-993-9851
James.Coons@ansalaw.com

John F. Dienelt, *pro hac vice*
Jonathan Labukas, *pro hac vice*
QUARLES & BRADY, LLP
1700 K Street NW, Suite 825
Washington, DC 20006


Elizabeth Buzalski (*individually and on behalf of The Tax Master, Inc.*)
86 Lowell Davis Road
Thompson, CT 06277
E-Mail: elizabeth@thetaxmasterinc.com

Pro Se Defendant and President of The Tax Master, Inc.

Telephone: 202-372-9510
Facsimile: 202-372-9598
John.Dienelt@quarles.com
Jonathan.Labukas@quarles.com

Attorneys for Plaintiff Jackson Hewitt Inc.

SO ORDERED:

This ____ day of _____, 2014

HON. CATHY L. WALDOR, U.S.M.J.